

EXHIBIT A

Correspondence with Mr. Blackburn

From: [Griffith, Greer](#)
To: [Tyrone Anthony Blackburn, Esq.](#)
Cc: [Diskant, Ted](#); [Linsky, Lisa](#); [Erica Wolff](#)
Subject: RE: Gardner v. Combs, et al. – Notice of Removal
Date: Monday, July 15, 2024 2:57:08 PM

Mr. Blackburn,

I hope you had a nice weekend. I just wanted to follow up on our emails from Friday. We plan to submit a letter to the court later today asking it to extend the deadline to move, answer, or otherwise respond to the Complaint to September 25, which we understand to be the same deadline you have already agreed to for Mr. Combs. We felt it made the most sense to have all defendants be on the same schedule so that the Court did not have to deal with multiple rounds of motion practice. Moreover, given that you plan to file a motion for remand, we imagine the Court will want to address that before dealing with any further motion practice.

We are hoping we can note your consent to this request, but if you could please let us know your position by the end of the day, we will include it with our letter.

Thanks,
Greer

GREER GRIFFITH
Partner

McDermott Will & Emery LLP One Vanderbilt Avenue, New York, NY 10017-3852
Tel +1 212 547 5578 **Mobile** +1 215 913 1418 **Email** ggriffith@mwe.com
[Biography](#) | [Website](#) | [vCard](#) | [LinkedIn](#)

From: Griffith, Greer
Sent: Friday, July 12, 2024 4:53 PM
To: Tyrone Anthony Blackburn, Esq. <tblackburn@tablackburnlaw.com>
Cc: Diskant, Ted <Ediskant@mwe.com>; Linsky, Lisa <llinsky@mwe.com>; Erica Wolff <EWolff@shertremonte.com>
Subject: RE: Gardner v. Combs, et al. – Notice of Removal

Mr. Blackburn,

Thanks for letting us know. In the interim, and so as to permit you time to file your motion for remand – and the Court to address it – we would like to ask the Court to set the date for defendants to move to dismiss or otherwise answer the Complaint for September 25, 2024. May we indicate your consent to that request? If not, please let us know, too, and we'll note your objection.

Best,
Greer

GREER GRIFFITH

Partner

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From: Tyrone Anthony Blackburn, Esq. <tblackburn@tablackburnlaw.com>

Sent: Friday, July 12, 2024 3:59 PM

To: Griffith, Greer <Ggriffith@mwe.com>

Cc: Diskant, Ted <Ediskant@mwe.com>; Linsky, Lisa <llinsky@mwe.com>; Erica Wolff <EWolff@shertremonte.com>

Subject: Re: Gardner v. Combs, et al. – Notice of Removal

[External Email]

Thank you for sharing. I will prepare a motion for remand.

Regards,

Tyrone A. Blackburn, Esq.

T. A. Blackburn Law, PLLC

TABlackburnlaw.com

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On Jul 12, 2024, at 3:52 PM, Griffith, Greer <ggriffith@mwe.com> wrote:

Mr. Blackburn,

Please find attached courtesy copies of the following documents which we filed today in the U.S. District Court for the District of New Jersey on behalf of those defendants who have been served in *Gardner v. Combs, et al.*, No. BER-L-003365-24, removing the case to federal court:

- Notice of Removal with Exhibits of *Gardner v. Combs, et al.*, No. BER-L-003365-24 (filed on federal court docket)
- Corporate Disclosure Statement (filed on federal court docket)
- Notice of Appearance (filed on federal court docket)
- Notice of Notice of Removal (filed on state court docket)

In addition, we would like to get a briefing schedule in place for defendants' anticipated motion to dismiss. We understand that you and counsel for Mr. Combs have discussed a deadline of September 25, 2024 for the filing of a motion to dismiss prior to removal. So as to avoid having multiple briefing schedules in place, we would propose that all served defendants in the case file any motions to dismiss by September 25. Please let us know if that works for you, and if so we can put together a proposed order for the Court. We would also be open to including a date for your brief in opposition if you would like us to – if so, please let us know what date you would like us to include.

Thanks,
Greer

GREER GRIFFITH
Partner

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